BRACEWELL

May 28, 2024

VIA ECF

The Honorable Jennifer H. Rearden United States District Judge 500 Pearl St. Southern District of New York New York, NY 10007-1312

Re: United States v. Charles McGonigal, No. 1:23-cr-00016-JHR

Your Honor,

We write as counsel for Charles McGonigal to respectfully request the Court's permission to file his letter-motion requesting an extension of his surrender date partially under seal. Mr. McGonigal's letter-motion contains information concerning

See United

States v. Amodeo, 71 F.3d 1044, 1050 (2d Cir. 1995) (noting that "[t]he privacy interests of innocent third parties . . . should weigh heavily in a court's" determination whether information should remain under seal) (internal quotations omitted).

Unredacted copies of the above-referenced letter-motion will be forwarded to the Government under separate cover on May 28, 2024.

Respectfully submitted,

Seth D. DuChame

Seth D. DuCharme

Meagan C. Maloney